

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INTELLECTUAL VENTURES I LLC AND
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

-against-

CITIGROUP, INC., CITICORP, and CITIBANK,
N.A.,

Defendants.

14 Civ. 4638 (AKH)

ECF CASE

JURY TRIAL DEMANDED

**DEFENDANTS' NOTICE REGARDING INSTITUTION OF
INTER PARTES REVIEW FOR U.S. PATENT NO. 6,546,002**

Defendants Citigroup, Inc., Citicorp, and Citibank, N.A. (collectively "Citi") hereby provide notice to the Court that on April 27, 2015, the United States Patent & Trademark Office ("USPTO") instituted *inter partes* review ("IPR") of United States Patent No. 6,546,002 ("the '002 Patent") based on two petitions for IPR filed by non-party International Business Machines Corporation ("IBM"). The USPTO instituted IPR of Claims 1-2, 4, 6-12, 14, 16-26, 28, and 30-49 (the "Challenged Claims") of the '002 Patent, and determined that there is a reasonable likelihood that IBM would prevail in showing the Challenged Claims were invalid. *See* Ex. A, IPR2015-00089 (instituting IPR on Claims 1-2, 4, 6-12, 14, and 16-24); Ex. B, IPR2015-00092 (instituting IPR on Claims 25, 26, 28, and 30-49)

Citi did not participate in, control, support, or pay for the preparation or filing of these petitions. Citi will provide further notice to the Court upon receipt of any information regarding further actions taken by the USPTO.

Dated: June 3, 2015

Respectfully submitted,

/s/ Brent P. Ray

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CERTIFICATE OF SERVICE

I certify that I caused a true and correct copy of the foregoing document to be served via the CM/ECF system of the U.S. District Court for the Southern District of New York on all counsel of record on June 3, 2015.

/s/ Brent P. Ray

Brent P. Ray